

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

FILED ENTERED  
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IN RE THE APPLICATION OF THE  
BALTIMORE SUN FOR ACCESS TO  
CERTAIN SEALED COURT RECORDS

18-CV-2444-CCB

AT BALTIMORE  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND DEPUTY

Related To Misc. No.  
16-mc-361

**MOTION TO UNSEAL**

The United States of America, by its undersigned counsel, hereby files this motion to unseal certain records sought by the Baltimore Sun. On August 10, 2018, the Baltimore Sun filed a motion for access to certain sealed court records (Document No. 1, filed August 10, 2018). The Application requested that the Government unseal three categories of documents related to the investigation of the Baltimore Police Department's Gun Trace Task Force conducted by undersigned counsel: (1) "search warrant materials"; (2) "PR/TT Materials," referring to pen register and trap and trace devices; and (3) "Section 2703(d) Materials."

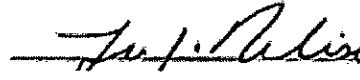
In its response to the Baltimore Sun's application, the United States moved to unseal these records on November 16, 2018. Since that time, the Baltimore Sun has asked for additional records to be unsealed, which are the subject of this motion.

Accordingly, attached to this filing are redacted versions of the additional documents that the Baltimore Sun seeks to unseal. To protect the privacy of those involved, the Government has redacted all personally identifiable information – e.g., email addresses, home addresses, telephone

numbers, and names of uncharged individuals and uncharged entities from the documents that are subject to unsealing at that time.<sup>1</sup>

Respectfully submitted,


Robert K. Hur  
United States Attorney

By:   
Leo J. Wise  
Derek E. Hines  
Assistant United States Attorneys

Dated: November 12, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that this filing was served on defense counsel via ECF electronic filing.

By:   
Leo J. Wise  
Assistant United States Attorney

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<sup>1</sup> There is ordinarily no legitimate governmental interest served by the government's public allegation of wrongdoing by an uncharged party. *See, e.g., In re Smith*, 656 F.2d 1101, 1106-07 (5th Cir. 1981). Courts have applied this reasoning to preclude the public identification of unindicted third-party wrongdoers in plea hearings, sentencing memoranda, and other government pleadings. *See, e.g., Finn v. Schiller*, 72 F.3d 1182 (4th Cir. 1996); *United States v. Briggs*, 513 F.2d 794 (5th Cir. 1975); *United States v. Anderson*, 55 F.Supp.2d 1163 (D. Kan 1999); *United States v. Smith*, 992 F. Supp. 743 (D.N.J. 1998).